



**Washoe County School District**

425 East Ninth Street \* P.O. Box 30425 \* Reno, NV 89520-3425  
Phone (775) 348-0200 \* Fax (775) 348-0304 \* [www.washoeschools.net](http://www.washoeschools.net)

Board of Trustees: Beth Smith, President \* Adam Mayberry, Vice President \* Joe Rodriguez, Clerk  
Jeff Church \* Diane Nicolet \* Colleen Westlake \* Alex Woodley \* Kristen McNeill, Ed.D., Interim Superintendent

January 17, 2024

RE: Mater Academy of Northern Nevada - Good Cause Exemption for MANN's Request to Amend Charter School Contract

Dear State Public Charter School Authority Board Members:

Washoe County School District (WCSD) appreciates the opportunity to communicate with Nevada State Public Charter School Authority (SPCSA) on important actions which impact the community and students which we all serve in Washoe County. The attached submission shall serve as the WCSD's Response Questionnaire outlining the issues and impacts regarding the proposed application of Mater Charter school.

WCSD has been long supportive of our charter partners when opening new schools in this district makes sense. This submission, however, is troubling on a number of levels, detailed in this submission.

- WCSD had no formal notice of this application until December 20, 2023 and has had less than two weeks to review an application in excess of 500 pages.
- Sponsors of this application have relayed to SPCSA staff that WCSD supports this application – support the district never offered.
- There are significant legal and financial concerns insufficiently addressed by the application.

***Background***

To provide some background into this submission, while WCSD received the Notice from SPCSA on this matter on December 15, 2023, WCSD did not receive the Application to be reviewed until December 20, 2023. Prior to that time, WCSD had no formal notice or communication with the applicant on this proposed new charter school, contrary to some of the representations in the Notice. The District is currently in the midst of transitioning to a new, interim, Superintendent. As such, WCSD requested an extended review period and were granted one additional week to provide this Questionnaire. WCSD appreciates the time from Executive Director Mackedon and her staff who met with WCSD virtually the week of Jan 1, 2024.

With a variety of staff turnovers and time away over the holidays, WCSD has done our best to provide the attached Questionnaire in response to your request; however, it is important to emphasize the limited time in which WCSD has been able to invest to offer valuable input on this matter. Accordingly, given that the WCSD has not been afforded sufficient notice or time to research and review the application and that the WCSD may not have all relevant information, the WCSD's submission may not cover all areas of concern that the SPCSA must consider in its meeting. Therefore, once the WCSD receives all relevant information and has sufficient time to summarize all areas of concern and impacts to the Washoe County community, the WCSD will supplement its submission accordingly.



### ***Apparent legal issues with submission***

In addition to the attached Response of issues and impacts to the Washoe County community, the WCSD must alert the SPCSA to potential legal issues with the Mater approval. At the outset, it is inappropriate to review the application as an amendment to the existing charter. Indeed, pursuant to NRS 388A.279, there are limited statutory purposes that may be considered by the SPCSA for amendment. The SPCSA's meeting agenda is not currently publicly posted; therefore, it is unclear what authority the SPCSA is relying on to review the application as an amendment. However, based on the information provided to the WCSD, the proposed amendment concerns purchasing land with no existing facilities or infrastructure for the charter school to then construct a new building on the purchased land. This scenario is not permitted by NRS 388A.279(d), which requires the charter to acquire a facility, not purchase a plot of land to begin new construction. Thus, the SPCSA cannot approve the application as a proposed amendment pursuant to plain language of NRS 388A.279.

Furthermore, the proposed new school in the North Valleys is wholly inappropriate as an "expansion" per NRS 388A.3934 due to the fact that this new school will offer 9th through 12th grades, which is a new program of service and curriculum for Mater Academy of Northern Nevada (MANN). Claims that MANN has a sister organization in Las Vegas (Mater Academy of Nevada - MAN) that serves 9-12, and that Mater Academy/Academica have similar models in the totally different state of Florida, do not achieve the standard of "expansion" defined in Statute. The Southern Nevada program is run by a completely different governing body and charter school program overseen by the Charter Authority - MAN, not MANN. This does not appear to be a valid "expansion" in accordance with NRS 388A.279 and should not be considered in this fashion.

### ***Operational and financial concerns with the submission***

Additionally, as the attached Response further details, there are significant operational concerns with the proposed purchase of the identified lot and the application fails to provide a comprehensive and feasible plan to operate additional facilities. Thus, this further mandates denial of the application pursuant to NRS 388A.279(3)(b), as well as NRS 388A.087(1), which requires the charter to follow all laws of the State related to purchasing land. Additionally, WCSD considers the financial suitability to this application to be insufficient – the City of Reno may impose conditions on the school construction, including the expansion of Lemmon Valley Drive, that would significantly increase construction costs for the facility itself. None of this is addressed in financial modeling in the application as required by NRS388A.273(b) and NRS388A.274(2)(a).

Moreover, NRS 388A.167 requires the SPCSA to create a plan to manage the growth of charter schools. It is unclear whether this proposal will adhere to the SPCSA's growth plan mandated in NRS 388A.167, or if the proposal violates the terms by exceeding the projections and authorized approvals in the plan.

Finally, upon the limited opportunity the WCSD had to review the application, there are concerns related to the proposal's ability to adhere to the Individuals with Disabilities Education Act (IDEA) and Section 504 of the Rehabilitation Act of 1973 (Section 504) in servicing students with disabilities on an Individualized Education Plan (IEP). The data in the application fails to take into consideration the Washoe County community and instead uses non-local data. Accordingly, without a reflection of the Washoe County community, including our students with disabilities in need of IEP services, the application fails to adequately address how students on an IEP will be

appropriately served. Such failure could not only lead to violations of the IDEA and Section 504, but also the discrimination prohibitions in NRS 388A.453, as well as the SPCSA's duties as the local education agency under NRS 388A.159.]

**Conclusion**

Accordingly, based on the foregoing and the attached Response of concerns and impacts, approval of the application as submitted is inappropriate and therefore must be denied or reconsidered at a future date once these issues are appropriately addressed.

Sincerely,

A handwritten signature in blue ink, appearing to read "Kristen McNeill". The signature is fluid and cursive, with a large initial "K" and "M".

Kristen McNeill, Ed.D

Interim Superintendent  
Washoe County School District



## Solicitation of Input – 2023 Fall Amendment Submission

**County:** Washoe  
**Proposal:** Mater Academy of Northern Nevada  
**Proposed Location:** Golden Valley campus will be located at (what is currently identified as) 0 North Hills Blvd., Reno, NV 89506

### School District Input:

**Please provide any data as to overcrowding in the zip code where the school is proposing to locate.**

The 89506 zip code, within which the proposed Mater Academy of Northern Nevada (MANN) Golden Valley Campus is planned, is generally comprised by Panther Valley, Golden Valley, Lemmon Valley and Stead making up the majority of what is referred to as the North Valleys region of the Truckee Meadows. 89506 is intersected and comprised by seven Washoe County School District (WCSD) elementary school enrollment boundaries, three middle school, two high school and also contains WCSD sponsored Sierra Nevada Academy Charter K-8. Of all schools intersecting this specific zip code, nor any nearby WCSD schools, none are currently, nor are projected to be operating beyond their capacity in an overcrowded condition.

The two high schools are operating at the highest percentages of student capacity, Hug High School whose enrollment boundary comprises Panther Valley's portion of enrollment at 96% and North Valleys High School comprising the Golden and Lemmon Valleys, Stead and Cold Springs portions operating at 98% of capacity. At the highest capacity measure, one elementary school (Lemmon Valley Elementary) within the 89506 zip code is operating at 89% of capacity.

With the exception to Stead Elementary and O'Brien Middle School, all other schools expected to be potentially impacted by MANN Golden Valley are operating under 80% of capacity. As a result of its remoteness and slowing new residential development absorption, Cold Springs Middle School is operating at 44% of its enrollment capacity. The possible impacts to schools as a result of the opening of MANN Golden Valley include impacted elementary schools seeing a total average enrollment of 62% of capacity, impacted middle schools falling to a total average enrollment of 60%, and as a result of MANN Golden Valley the impacted high schools are anticipated to fall to a total average enrollment of 80%. School closures at the elementary school level would be likely upon the opening of MANN Golden Valley. Alice Smith Elementary, which is immediately adjacent to the proposed MANN Golden Valley campus is projected to see an enrollment of 76% of capacity at MANN Golden Valley's full materialization.

**Does the School District's Capital Improvement Plan include any plans to add new schools or add additional capacity to existing schools within the community in which the applicant proposes to locate?**

Over the past 5 years alone, WCSD has invested nearly a half-billion dollars into capital projects across schools within this zip code and immediately adjacent, projected to be impacted by the opening of this new school, MANN Golden Valley. This list is highlighted by the new Procter Hug High School (newly built in 2021-22; \$200 million), Desert Skies MS (newly built in 2019-20; \$90 million), O'Brien MS (fully reconstructed as of 2022-23; \$96 million), Inskeep ES (newly built in 2020-2021; \$45 and several other significant CIP projects.

Additionally, On Tuesday December 12, 2023 WCSD's Board of Trustee's approved the school district's Facilities Modernization Plan (FMP) which identifies the construction of a brand new 750 student capacity Stead Elementary School at 0 Trading Post Rd. Reno, NV 89506 (APN: 086-030-57), beginning in 2024. Per the FMP, Lemmon Valley Elementary School is also slated to be reconstructed into a 750 student capacity facility on its existing property around a similar timeframe. Additionally included in the FMP for FY25 are the beginning design stages of a comprehensive modernization to North Valleys High School, a budgeted investment of over \$100million.

Lastly, WCSD is currently constructing a new additional comprehensive Career and Technical Education (CTE) High School on Sutro Avenue, less than 5 miles from the proposed location of MANN Golden Valley. The Debbie Smith CTE High School is under construction and scheduled to open in the 2025-26 school year, drawing students predominantly from the North Valleys and North Reno, representing an investment of over \$150 million of Washoe county taxpayer dollars with a projected additional enrollment capacity of over 900 students grades 9-12.

All other schools outside of three years old within the 89506 zip code are slated to receive, in the least, renovations and revitalizations which will bring their facilities to relative standards as the district's brand new facilities.

As you know, the SPCSA approved the Academic and Demographic Needs Assessment on July 26, 2019 and approved an updated version on, January 22, 2021, January 28, 2022, and subsequently November 18, 2022. A copy of the current version can be found [here](#). Our staff and board will be evaluating the degree to which the applicant aligns with the identified needs. Please provide any input as to how this applicant does or does not meet identified needs in the community.

All of the schools in the proposed 89506 intersection area serve predominantly high needs, underserved populations as identified in the SPCSA Academic and Needs Assessment, including high populations of minority, IEP, EL, and FRL students. Schools in this area have received between 1 and 2 stars in the last two years of NSPF ratings (note that 21-22 star ratings are unofficial since NV received an accountability waiver for that year). Mater Academy – MANN in Reno has typically served a high proportion of students in these underserved population groups, and received an equivalent of a 3 star rating the past two years.

School Name	Grades Served	22-23 Enrollment	% Capacity	% Minority	% IEP	% EL	% FRL	21-22 Star Rating (index)	22-23 Star Rating (index)
Bennett	K-5	538	75%	70.9	21.6	33.6	100.0	1 star (20.5)	1 star (10.5)
Desert Heights	K-5	463	65%	66.3	27.0	18.6	100.0	2 star (38)	1 star (12)
Elmcrest	K-5	319	58%	63.0	17.2	14.1	100.0	2 star (34)	1 star (11)
Lemmon Valley	K-5	714	89%	64.7	14.2	22.4	100.0	2 star (38.5)	1 star (18)
Silver Lake	K-5	424	79%	58.3	15.3	21.5	40.6	2 star (37.5)	2 star (28)
Alice Smith	K-5	501	72%	70.9	20.0	22.4	100.0	2 star (36.5)	1 star (29)
Stead	K-5	702	85%	70.9	14.1	24.9	100.0	1 star (11)	1 star (26)
Cold Springs MS	6th-8th	648	44%	42.9	17.6	6.0	34.7	2 star (37)	2 star (30.5)
Desert Skies MS	6th-8th	978	69%	81.1	15.8	23.9	100.0	1 star (25.5)	1 star (18)
O'Brien MS	6th-8th	1065	83%	74.7	14.7	17.7	100.0	1 star (12)	1 star (12)
North Valleys HS	9th-12th	2432	98%	64.6	14.4	13.7	37.1	2 star (42)	2 star (37.5)
Hug High	9th-12th	2331	96%	86.6	16.6	27.0	100.0	2 star (45.5)	2 star (35.5)
Mater Academy – MANN	K-8	489	N/A	87.5	15.5	38.0	100.0	3 star (64)	3 star (65)

**If district staff or Board of Trustees has had prior communications with this applicant, please provide any relevant information or details from that communication that might be useful to the SPCSA in making an informed decision regarding the application.**

Please see enclosed statements from WCSD Board Vice President Dr. Diane Nicolet and Trustee Alex Woodley. Also included are statements from Associate Chief Jen Van Tress and Deputy Superintendent Dr. Keo of WCSD.

**Are there currently any schools providing a similar educational model in the community in which the applicant proposes to locate? If yes, please provide any relevant information on the current school(s) with similar educational models that are available to students in the community.**

Yes – Mater Academy of Northern Nevada K-8 located at 2680 E 9<sup>th</sup> Street, Reno, NV 89512.

As mentioned above, WCSD Sponsored Sierra Nevada Academy Charter School K-8 at 5600 Fox Avenue, Reno, NV 89506 operates roughly 4.1 miles away from the proposed MANN Golden Valley site.

**Is there any other additional information you wish to provide?**

NRS 388A.276 requires that the SPCSA review the financial adequacy of MANN's application. Within the "General Facility RFA Requirements" section of this application (p142-151) a number of questions are left unanswered. This should be unsatisfactory to SPCSA.

As discussed above, WCSD has a great deal of experience in recent construction of very similar projects. In review of the MANN Application, it is clear that the construction budget (Attachment 25) – totaling approximately \$44 million, phased over at least a 5-year span – is estimated by the Washoe County School District to be approximately 50% undervalued. This project will likely cost at least 1.5 times what is represented which may endanger its viability in other ways.

The school district, and this region has been experiencing enrollment declines for several years and steadily declining birth and students per capita rates. The current 10-year projected K-12 enrollment for all impacted WCSD schools demonstrates essentially zero net growth in total number of students, before factoring the impacts of this additional new school. There is no overcrowded school within this region of the WCSD and absent enrollment growth, this is a zero-sum scenario. An addition of a new K12 school will only accelerate further atrophy of WCSD enrollments.

These losses impact the funding of teachers, custodians, nutrition service workers, bus drivers, support staff and school administrators.



## RESPONSE TO SPCSA12/28/2023 EMAIL

To: WCSD Trustee Beth Smith-Board President  
Cc: WCSD Interim Superintendent-Kristen McNeill  
From: WCSD Trustee Diane Nicolet-Board Vice President  
Date: December 30, 2023

In reference to Melissa Mackedon's, Thursday-December 28, 2023, at 1:01 PM, email sent to Beth Smith and Kristen McNeill stating that, (*Cut directly from email*): Additionally, MANN's executive director Gia Maraccini reports that on April 14, 2023, WCSB members Dr. Diane Nicollet was on site, and they discussed the expansion.

### Facts are as follows:

- Trustee Diane Nicolet's visit to Mater Academy, 9:00-10:30 AM, Friday-April 14 at 2680 E. 9<sup>th</sup> Street, Reno NV 89512.
- Present with Trustee Nicolet were Principal-Gia Maraccini, Academica Director of Operations-Colton Loretz and WCSD Coordinator of Extended Studies-Stacey Cooper.
- Discussion about the possible MANN expansion occurred.
- Discussion included acquiring the former Boy's and Girl's Club (BGC) site that is in proximity to WCSD Vaughn Middle School.
- There was discussion about moving to the BGC site, nothing definite shared with me.
- Principal Maraccini shared her concern about the former BGC site as she felt it was too small for future expansion planning.
- I shared my publicly well-known stance: *A family has the right and responsibility to choose what is best for their family, to include educational decisions.*
- There was discussion about the number of students for future planning- I do not recall the stated number.
- Long range idea of Mater Academy K-12<sup>th</sup> grades was shared with me.
- A tour of the school followed the discussion.

## RESPONSE TO SPCSA12/28/2023 EMAIL

During my visit to Mater Academy, I was not asked for, nor did I give approval for an expansion. As a School Board Trustee, I serve as 1 of 7 elected officials for WCSD with no power to make such a decision or promise. As with every school I visit in Washoe County, I regard myself as a guest and student; someone willing to ask, listen and learn. During my April 14, 2023, visit to Mater Academy I learned of the organization's desire to expand because of their growing student body numbers. At no time was any site-specific information, other than the former Boy's and Girl's Club mentioned. I was not given a full briefing during the Mater Academy school visit. For my purposes, a full briefing would have included site specifics, programming, operations, financial details and related research into county and city protocols. A full briefing would have also included an acknowledgement that such information was provided to WCSD Administration and other appropriate stakeholders. Those particulars were not provided or discussed.

## McNeill, Kristen M

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**From:** Keo, Seng-Dao  
**Sent:** Wednesday, January 3, 2024 1:14 PM  
**To:** McNeill, Kristen M; Van Tress, Jen; Enfield, Susan  
**Cc:** Searcy, Adam T; Parks, Troy; Aguilar, Luis  
**Subject:** RE: [EXTERNAL] Charter Authority Update  
**Attachments:** FW: Mater Academy Expansion Survey- PLEASE REVIEW

Team,

Ms. Mackedon's statement about me is inaccurate (based on what she claims Danny said I said in the meeting on June 21<sup>st</sup>). I never stated any support for (or lack of support for) the charter school's new location, but rather discussed with Rebecca Feiden and Mark Modrcin that the charter authorizer had scrapped its original plan for expansion and acknowledged that it would be resubmitting another plan to initiate the process for a different location—which our team would then have to review again and provide our comments/feedback. While I do not have notes from the meeting on June 21<sup>st</sup>, based on my recollection and emails from that time period, the meeting was to discuss two items in general with SPCSA: 1) concurrent enrollment of district-sponsored charter school students into summer school; and 2) charter school openings and expansions.

To be clear, Rebecca and Mark notified the district that the original application was not moving forward and that Mater was planning on resubmitting another application in the near future. The expansion at this new site was not discussed and reviewed with WCSO, as it is being presented in this email chain. Our team was never informed of any specific location or details on expansion, but rather told that Mater Academy intended to resubmit another application and that we should await that information. I acknowledged this and shared that we would await the information and review it when the time comes.

All my best,  
Seng

Seng-Dao Yang Keo, Ed.L.D. (she/her/hers)  
Deputy Superintendent, Washoe County School District  
425 East Ninth Street  
P.O. Box 30425  
Reno, Nevada 89520  
Email: [sengdao.keo@washoeschools.net](mailto:sengdao.keo@washoeschools.net)  
Office Phone: 775-789-4636

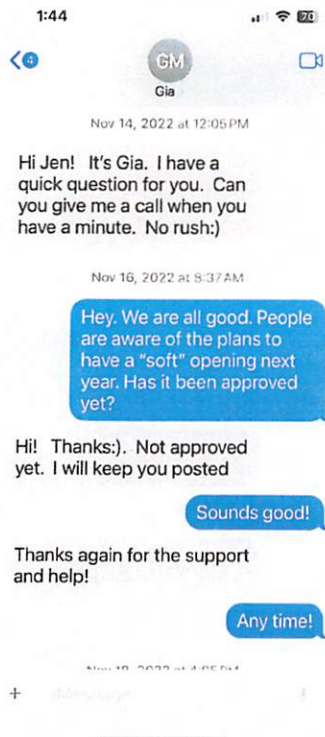
## McNeill, Kristen M

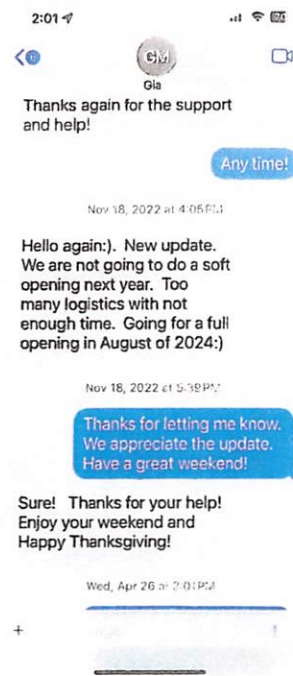
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**From:** Van Tress, Jen  
**Sent:** Thursday, December 28, 2023 2:12 PM  
**To:** McNeill, Kristen M  
**Subject:** RE: [EXTERNAL] Charter Authority Update

Hi Kristen,

Since Gia and I were principals together, we've stayed in touch over the years. Also, as you know, I do a lot of volunteer work with the Boys and Girls Club and see her at the annual functions. She texted me on November 14, 2022 about a new charter school they were proposing to open across from Vaughn MS, not about a new school in North Valleys. Here is the original text message:





At that time, I reached out to Stacy Cooper, who was over charters and asked if she was aware of the new school and she stated she was aware and addressing the questions. Then, as you can see, there was a text that the Vaughn location was not going to open until August 2024. The “soft opening” was scheduled for the Boys and Girls Club, Bresson Ave location. The next I heard was that the Vaughn location was not approved and Mater was not going to expand.

I didn't know about a North Valleys school location until I saw Gia at the Barrels and Bites fundraiser for the Boys and Girls Club back in September 2023 while I was volunteering for the Club. She and I had a casual conversation while I was selling raffle tickets about the potential of the new charter opening in North Valleys. She was with her teachers and AP, Amy Wright. The entire conversation may have lasted 3 minutes. Gia called me last Friday upset stating that she had told me about the new school at the fundraiser, so I was responsible for letting everyone know. I told her that if what I considered a casual conversation between friends at a fundraising event constituted formal notice to WCSD, then we will need discuss boundaries between friendship and work relations.

Please let me know if you have any questions.  
Thanks,  
Jen

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**From:** Woodley, Alex <Alex.Woodley@WashoeSchools.net>  
**Sent:** Tuesday, January 2, 2024 2:22:55 PM  
**To:** Smith, Elizabeth A <Elizabeth.Smith@WashoeSchools.net>  
**Cc:** McNeill, Kristen M <Kristen.Mcneill@WashoeSchools.net>  
**Subject:** Re: [EXTERNAL] Charter Authority Update

Hello President Smith,

I wanted to provide you details of my site visit last May (2023) with the principal (Gia Maraccini) of Mater Academy located on Nineth St.

My site visit entailed walking through the entire structure of the school and listening to Ms. Maraccini about the successes and statistics related to the school I was visiting.

I did not at any time get into discussion related to the construction of a future school in the North Valleys area, much less within proximity of the existing Alice Smith Elementary School.

Thank you.

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